

# PAIA MANUAL

**Darktrace South Africa (Pty) Ltd**

## 1. Introduction and Purpose

This Promotion of Access to Information Act ("PAIA") Manual has been prepared by Darktrace South Africa Proprietary Ltd ("Darktrace SA" or "the Company") in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), read together with the Protection of Personal Information Act 4 of 2013 ("POPIA").

This Manual is intended to:

- Promote transparency and accountability within Darktrace SA;
- Provide information regarding the categories of records held by the Company;
- Describe the procedure for requesting access to records held by the Company; and
- Outline the Company's approach to the processing of personal information in accordance with POPIA.

This Manual is intended to comply with the minimum statutory requirements under PAIA and POPIA. It does not constitute a contractual undertaking by the Company. Any rights not expressly recorded herein remain governed by applicable legislation.

## 2. Definitions and Acronyms

| Term                             | Definition                                            |
|----------------------------------|-------------------------------------------------------|
| PAIA                             | Promotion of Access to Information Act 2 of 2000      |
| POPIA                            | Protection of Personal Information Act 4 of 2013      |
| Information Officer (IO)         | The person designated in terms of PAIA and POPIA      |
| Deputy Information Officer (DIO) | A person designated to assist the Information Officer |
| Information Regulator            | The Information Regulator of South Africa             |
| The Company                      | Darktrace South Africa Proprietary Ltd                |

## 3. Details of the Company

**Registered Name:** Darktrace South Africa Proprietary Ltd

**Registration Number:** 2016/255927/07

**Registered Address:** Oakdene House – 229 Carina Street, Waterkloof Ridge, Pretoria, Gauteng, 0181

**Office Address:** DP World Wanderers Stadium, Corlett Drive, Illovo, Johannesburg, 2196

**Website:** <https://www.darktrace.com>

## 4. Information Officer and Contact Details

### Information Officer

**Name:** Amabel Evans

**Title:** VP, Legal & Deputy Company Secretary

**Email:** amabel.evans@darktrace.com

### Deputy Information Officer

**Name:** Iain Pye

**Title:** Head of Risk & Privacy

**Email:** iain.pye@darktrace.com

**PAIA Requests Contact**

**Email:** [Co-sec@darktrace.com](mailto:Co-sec@darktrace.com)

## 5. Guide On How to Use PAIA

The Information Regulator has, in terms of section 10 of PAIA, published a Guide on how to use PAIA. The Guide is available:

- From the Information Regulator's website: <https://justice.gov.za/infoereg/>;
- For inspection at the offices of the Information Regulator; or
- Upon request from the Company's Information Officer.

## 6. Categories of Records Available without a Formal PAIA Request

The following categories of records may be accessed without submitting a formal PAIA request:

- This PAIA Manual;
- Privacy and data protection notices published by Darktrace;
- Information published on the Darktrace website;
- Publicly available corporate information; and
- Publicly available recruitment and vacancy information.

## 7. Records Available in Terms of Other Legislation

| Term                          | Definition               |
|-------------------------------|--------------------------|
| Memorandum of Incorporation   | Companies Act 71 of 2008 |
| Statutory company records     | Companies Act 71 of 2008 |
| PAIA Manual                   | PAIA                     |
| Data protection documentation | POPIA                    |

## 8. Description of Records held by the Company

Darktrace SA holds records in respect of the following subject areas:

**Human Resources**

- Employment contracts;
- Personnel and payroll records;
- Recruitment and training documentation.

**Finance**

- Accounting and financial records;
- Tax and statutory filings;
- Payment and invoicing records.

**Corporate and Legal**

- Company secretarial records;
- Governance and compliance documentation;
- Regulatory correspondence.

**Information Technology and Security**

- System access and usage records;
- Information security and monitoring records.

**Operations and Research**

- Internal operational reports;
- Technical and research documentation.

## 9. Processing of Personal Information

### 9.1 General Principles

Personal information is processed by Darktrace SA lawfully, fairly, and transparently, and only to the extent necessary to fulfil legitimate business purposes and statutory obligations. The Company endeavours to ensure that personal information is accurate, complete and safeguarded against unauthorised access, loss or disclosure.

### 9.2 Purpose of Processing

The Company processes personal information for purposes including:

- Recruitment and employment administration;
- Management of employment relationships;
- Compliance with legal and regulatory obligations;
- Information security, access control and system administration;
- Internal operations and corporate governance; and
- Support of Darktrace business activities.

### 9.3 Categories of Data Subjects

- Employees and contractors;
- Job applicants;
- Customers and prospective customers;
- Business partners and service providers;
- Website and office visitors.

### 9.4 Categories of Personal Information

- Identity and contact information;
- Recruitment and employment information;
- Technical and usage information;
- Marketing and communications information.

## 9.5 Recipients of Personal Information

Personal information may be disclosed, where appropriate, to:

- Other companies within Darktrace group;
- Third-party service providers acting on behalf of Darktrace;
- Professional advisers, auditors and legal counsel; and
- Regulatory or law enforcement authorities where required by law.

## 9.6 Transborder Flows of Personal Information

As part of a global group, personal information may be transferred outside the Republic of South Africa to Darktrace group entities and service providers located in jurisdictions such as the United Kingdom and the European Union, subject to appropriate safeguards consistent with POPIA.

## 9.7 Security Measures

Darktrace SA maintains appropriate administrative, technical and organisational measures to protect personal information, including access controls, security policies, training and incident response procedures.

# 10. Request Procedure for Access to Records

Requests for access to records must be submitted in writing to the Information Officer in the prescribed form and must comply with the procedural requirements set out in PAIA.

The Company is not obliged to create or compile new records in response to a PAIA request.

Access to records may be refused on the grounds set out in Chapter 4 of PAIA, and each request will be assessed on its own merits.

PAIA requests are distinct from requests made by data subjects in terms of POPIA.

# 11. Fees

Fees for access to records are payable in accordance with the regulations published under PAIA. Details regarding applicable fees may be obtained from the Information Officer.

# 12. Availability of this Manual

This Manual is available:

- on the Darktrace website;
- at the Company's principal place of business for inspection during normal business hours;
- upon request from the Information Officer, subject to payment of a prescribed fee; and
- to the Information Regulator upon request.

## 13. Updating of the Manual

This Manual will be reviewed and updated by the Information Officer from time to time to ensure ongoing compliance with PAIA, POPIA and other applicable legislation.

## 14. Document Control

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